

July 13, 1982

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	7-13-82

Mr. David Edwards, Facilities Manager Litton Systems Incorporated Advanced Circuitry Division P.O. Box 2847 Springfield, MO 65803

Dear Mr. Edwards:

In review of the closure plans submitted to Mr. Fred Lafser, Director of the Department of Natural Resources, on June 30, 1982, the Waste Management Program still finds it to be very sketchy and lacking details in a number of areas. Litton ACD must provide the following further information in a revised closure plan by July 23, 1982:

- All analysis of the sludge from the bottom of Pond A, along with sampling procedures and locations. Include the size of the samples, depth of the samples, and the sample preparation and analysis procedures;
- All calculations along with the assumptions and an explanation demonstrating how the reduced volume of all of the sludge from Pond A will be approximately 400 cubic yards. Also include the estimated specific density of the centrifuged sludge;
- 3. Details of the size and operations, with specifications, of the centrifuge to be used by O.H. Materials to reduce the volume of the sludge to approximately 400 cubic yards.
- 4. Details of the sampling and analysis of the soil within Pond A once the sludge is removed to insure that all contaminated soils have been removed. At a minimal, this must include the number of samples, approximate location of the samples to be taken, sampling procedures, method of analysis, parameters for analysis, the minimum detection limits for this analysis for each parameter, and the maximum levels of contamination for each parameter that will be allowed to remain in place; and
- 5. Details of who the independent professional registered engineer will be and his involvement in the oversight of the closure activities. At a minimum he must be on site during about 2 percent of the closure activities and review all laboratory analysis to confirm compliance with the approved closure plan.

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Christopher S. Bond Governor Fred A. Latser Director Division of Environmental Quality

Robert J. Schreiber Jr., P.E. Director

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A revised closure plan must be resubmitted in its entirety with the details described above. The revised closure plan must not include the statement in 265.112, letter H, that "Litton reserves the right to alter the plan and permit pending additional information." A closure plan that can be amended by Litton ACD cannot be approved. Litton ACD must commit itself to close Pond A in accordance with the approved closure plan. Any additional information which may affect the approved closure plan must be submitted to the Department of Natural Resources, Waste Management Program, P. O. Box 1368, Jefferson City, Missouri 65102. If Litton ACD is of the opinion that the additional information warrants an amendment to the approved closure plan, a request for such amendment with justification should accompany the additional information submitted to the Waste Management Program. Approval or denial of the request will be in a timely manner, and all such requests must be approved prior to implementation.

Depending on the content of the revised closure plan and the date it is received by the Waste Management Program, all efforts will be made to give approval of the submitted closure plan by August 1, 1982. Closure activities may not begin until the closure plan submitted by Litton ACD is approved in writing by the Waste Management Program.

If you have any questions concerning this letter please contact Mr. Paul Meiburger at (314) 751-3241.

Sincerely,

David E. Bedan, Ph.D.

Director

Waste Management Program

DEB/PM/jas

cc: Ron Enos, Litton ACD
Treva Hearne, Counsel, DEQ
Ed Downey, Attorney General's Office

Bob Schreiber, Director, DEQ

bee Robert Morly